

Application No. 09/902,466
Amendment dated November 2, 2005
Reply to Office Action dated May 3, 2005

Remarks

Claims 1-16 are pending.

Claims 1-16 stand rejected

Claims 1 and 14 have been amended.

Claim 4 has been cancelled.

Claims 1-3, 5-16 are presented herein for review.

No new matter has been added.

In paragraph 2 of the Office Action, the Examiner has rejected claims 1-3, 8-9, 12 and 14 under 35 U.S.C. § 102(e) as being anticipated by Andersson et al. (U.S. Patent No. 6,693,894). In paragraph 4 of the Office Action, the Examiner has rejected claims 4-5, 10-11 and 13 under 35 U.S.C. 103(a) as being unpatentable over Andersson in view of Albal (U.S. Patent No. 6,668,046). In paragraph 5 of the Office Action, the Examiner has rejected claims 6-7 and 15-16 under 35 U.S.C. 103(a) as being unpatentable over Andersson in view of Lee et al. (U.S. Patent No. 6,847,632).

Applicant respectfully disagrees with the Examiner's contentions and submits the following remarks in response.

Applicant begins by noting that the subject matter of dependent claim 4 has been amended into independent system claim 1 as well as independent mirror method claim 14. As such, the present invention is directed to a telephone system for transmitting telephone signals between first and second mobile stations. The system includes first and second internet protocol interfaces where one of the first and second internet protocol interfaces maintains an echo canceller/equalizer module configured to correct distortions in the phone signal caused by the

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travel of the phone signal through free air, server delays and internet delays.

Such a system, as discussed on pages 12 and 13 of the specification as filed, provides addition echo cancellation in VoIP situations to make up for time delays caused by various problems in connecting voice calls through the internet. Although echo canceling means are generally provided by cellular towers, the addition of the packetized transmissions through internet connectivity servers may add additional delays to the voice signaling, exacerbating echo problems. Although the echo canceling from the cell towers may correct for some of these problems, the present invention improves the transmission further by providing additional equalization and echo cancellation within each of the internet protocol interfaces themselves. Such an arrangement is not found in the cited prior art.

The Examiner cites principally to the Andersson reference. However, the Examiner notes that Andersson does not teach an echo canceller. The Examiner finds such a canceller in the Albal reference and indicates that it would have been obvious to combine the reference to arrive at the present invention as claimed (in claim 4).

Contrary to the Examiner's contentions, one of ordinary skill in the art would not look to add the echo canceller from Albal to Andersson. First, Andersson teaches a methodology for reducing signal delay in a VoIP call being directly routed to a called party's current network, bypassing their home network when the called party is roaming. As such, Andersson teaches a method for reducing time delay issues in a VoIP calls where the called party is roaming. As such, Andersson teaches a method for reducing time delay issues in a VoIP call *by another means* other than echo cancellation. As such, there is no need for one of ordinary skill using the Andersson system to look to add additional echo cancellers, beyond those already in the mobile station cell towers to the internet protocol interfaces as is done in the present invention.

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Andersson make no such specific suggestion nor does Albal suggest its combination with such a system as used in Andersson. Furthermore, there is no need in Andersson for the type of echo canceller used in Albal, discussed below, absent some suggestion in either document.

Secondly, even if the echo canceller of Albal was combined with Andersson, the resulting system would still not teach or suggest the present invention as claimed. The echo canceller in Albal as shown in Fig. 6 and described in column 12, lines 5-10, refers to an echo canceller within a client VRU 232 in order to reduce or cancel text-to-speech or playback echoes transmitted from the PSTN *due to hybrid impedance mismatches*.

Albal refers to a billing system for telephone communications. Although VoIP calls are discussed in Albal, the echo canceller embedded within VRU 232 is not analogous to the echo cancellers of the present invention. As discussed above, the echo cancellers of the present invention are for correcting distortions in phone signal caused by the *travel of said phone signal* through free air, server delays and internet delays that occur as the packets travel through the various internet networks. Such echo causing occurrences require time delay echo cancellation. On the other hand, hybrid impedance mis-match echo cancellation as suggested by Albal is not performed in the present invention.

Thus, even when combined, the resulting system of Albal and Andersson still would not teach or suggest the present invention as claimed. For example, neither Albal nor Andersson, either alone or in combination with one another, teach or suggest first and second internet protocol interfaces each having an echo canceller/equalizer module configured to correct distortions in the phone signal caused by the travel of the phone signal through free air, server delays and internet delays.

For at least this reason, Applicant respectfully requests that the rejection of independent

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claims 1 and 14 be withdrawn. Furthermore, as claims 2-3, 5-13 and 15-16 depend from claims 1 and 14, the rejection of these claims should be withdrawn for the same reasons.

In view of the foregoing, Applicants respectfully submit that pending claims 1-3 and 5-16 are in condition for allowance, the earliest possible notice of which is earnestly solicited. If the Examiner feels that an interview would facilitate the prosecution of this Application he is invited to contact the undersigned at the number listed below.

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Respectfully submitted,

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